

Exhibit C

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X **Docket#**
UNITED STATES OF AMERICA, : 23-cv-369 (NRM) (RML)
: :
Plaintiff, : :
: :
- versus - : U.S. Courthouse
: Brooklyn, New York
RARE BREED TRIGGERS, LLC, ET AL, :
: March 8, 2023
Defendants : 2:00 p.m.
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TRANSCRIPT OF CIVIL CAUSE FOR VIDEO CONFERENCE
BEFORE THE HONORABLE NINA R. MORRISON
UNITED STATES DISTRICT JUDGE

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(VIA VIDEO/AUDIO)

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Proceedings

1 triggers would find a way in New York.

2 Now, that's one that I'm not sure there's any
3 real dispute. It's just the testimony is what it is and
4 the question is what is the significance of that.
5 There's no other evidence that we know of that the
6 government is relying on to suggest that they
7 intentionally directed these triggers to New York. In
8 fact, they did the opposite.

9 The final point, your Honor, is that they --
10 and there are number of things they say about defendant
11 RBF, Rare Breed Firearms, which is not Rare Breed
12 Triggers. Rare Breed Firearms doesn't sell the triggers
13 at issue. They claim that, the government claims that
14 RBF sells firearms in New York and some firearm
15 accessories in New York and elsewhere.

16 Your Honor, I'll just be blunt. That's false.
17 RBF doesn't sell firearms at all. It licenses designs to
18 another company that then makes and sells the firearms
19 which is basically a design company. It also sells swag,
20 tee shirts, hats, that kind of thing. And it is true
21 that some of those I think tee shirts and hats got sold
22 in New York at some point. It's a separate company.

23 So the bottom line there, your Honor, our
24 argument is RBF is not relevant at all but the claim that
25 it sells firearms is just not true. It doesn't sell